

## **EXHIBIT B**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 9
CITY OF CHESTER, PENNSYLVANIA,	:	Case No. 22-13032
Debtor.	:	

**NOTICE OF EXPEDITED HEARING ON INITIAL MOTIONS OF DEBTOR**

**TO THE PARTIES RECEIVING THIS NOTICE:**

1. On November 10, 2022 (the “Petition Date”), the City of Chester (“Chester” or the “City”), commenced a case (the “Chapter 9 Case”) under chapter 9 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Eastern District of Pennsylvania (the “Bankruptcy Court”). The Chapter 9 Case is pending before the Honorable \_\_\_\_\_, United States Bankruptcy Judge.

2. On November 10, 2022, the City filed a motion [Docket No. \_\_\_\_] (the “Expedited Hearing Motion”) seeking an expedited hearing on certain motions filed on the Petition Date (collectively, the “Initial Motions”).

3. On November \_\_, 2022, the Court entered an order [Docket No. \_\_\_\_] approving the relief requested in the Expedited Hearing Motion (the “Expedited Hearing Order”). By the Expedited Hearing Order, the Court scheduled a hearing on the Initial Motions for \_\_:\_\_.m. on \_\_\_\_\_, 2022, in Courtroom #4 at the United States Bankruptcy Court for the Eastern District of Pennsylvania., Robert N.C. Nix Sr., Federal Building & Post Office, 900 Market Street, 2nd Floor, Philadelphia, Pennsylvania 19107 (the “Initial Hearing”). A copy of the Expedited Hearing Order is attached hereto as **Appendix I**.

4. The Initial Motions consist of the following:

- a. Motion of Debtor for Entry of an Order (A) Directing and Approving Form of Notice of Commencement of Case and Manner of Service and Publication of Notice, (B) Establishing a Deadline for Objections to Eligibility, and (C) Granting Related Relief [Docket No. 8] (the “Eligibility Scheduling and Notice Motion”);
- b. Motion of Debtor for Entry of an Order Appointing Donlin, Recano & Company, Inc. as Claims and Noticing Agent Pursuant to 28 U.S.C. § 156(c), Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 2002 [Docket No. 9] (the “Claims Agent Motion”); and
- c. Motion for an Order Finding that 11 U.S.C. § 362 Does Not Operate as a Stay of the Receiver’s Modification of Recovery Plan Pending Before the Commonwealth Court of Pennsylvania, or Alternatively, for Relief from the Automatic Stay [Docket No. 10] (the “Stay Clarification Motion”).

**IF YOU WISH TO BE HEARD WITH RESPECT TO THE RELIEF REQUESTED BY THE CITY IN ANY OF THE INITIAL MOTIONS, THEN YOU MUST APPEAR AT THE INITIAL HEARING, EITHER IN PERSON OR TELEPHONICALLY PURSUANT TO THE BANKRUPTCY COURT’S PROCEDURES FOR TELEPHONIC PARTICIPATION AT HEARINGS.**

5. Copies of the Initial Motions are being served on you and are available, along with all other documents filed in this case, free of charge at the City’s restructuring website at <http://www.donlinrecano.com/chesterpa> or, on paid subscription basis, through the Bankruptcy Court’s PACER system at [ecf.paeb.uscourts.gov](http://ecf.paeb.uscourts.gov).

6. If you wish to receive further notices in this Chapter 9 Case, you are encouraged to appear formally and file with the Bankruptcy Court a written request for service of papers pursuant to the Federal Rules of Bankruptcy Procedure.

**BY ORDER OF THE COURT**